

Kris Hall

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Air Protection Division

March 31, 2016

James Rebarchak  
Regional Air Quality Program Manager  
Department of Environmental Protection  
Southeast Regional Office  
2 East Main Street  
Norristown, PA 19401

Re: **Title V Annual Compliance Certification**  
Braskem America, Inc. - Marcus Hook  
TVOP 23-00012; **Report Period:** 1/1/2015 – 12/31/2015

Dear Mr. Rebarchak:

Braskem America, Inc. hereby submits the above-referenced report. This attached report is required by our Title V Permit, Section B, Condition #024.

As required by our Title V Permit, Section B, Condition #026, Braskem America, Inc. hereby states that this facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa Code §127.512(i).

Please note the following contacts at the facility for Title V:

	<b><u>Permit Contact Person</u></b>	<b><u>Responsible Official</u></b>
<b><u>Name:</u></b>	Jeffrey Hirt	Conway Yee
<b><u>Title:</u></b>	Environmental Engineer	Facility Manager
<b><u>Phone:</u></b>	(610) 497- 8229	(610) 497-8208

If you have any questions, please do not hesitate to contact our *Environmental Engineer*, Jeffrey Hirt, at the above number or by e-mail at [jeffrey.hirt@braskem.com](mailto:jeffrey.hirt@braskem.com).

Sincerely,  
BRASKEM AMERICA, INC.



Conway Yee  
Facility Manager

cc: Air Enforcement Branch (3AP12)  
**U. S. Environmental Protection Agency, Region III**  
1650 Arch Street  
Philadelphia, PA 19103-2029



## PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF AIR QUALITY  
COMPLIANCE CERTIFICATION FORM

(25 Pa. Code § 127.513)

Plant Name:	BRASKEM AMER INC/MARCUS HOOK	Owner/Operator:	BRASKEM AMER INC
Tax ID/Plant:	25-1534498-1	DEP Facility ID:	515469
Contact Person:	JEFFREY HIRT	Title:	ENVIRONMENTAL ENGINEER
Operating Permit #:	23-00012	Phone Number:	(610) 497-8229

For the period **01/01/2015 – 12/31/2015**, **BRASKEM AMER INC/MARCUS HOOK** has been in continuous compliance with all applicable requirements of permit # **23-00012**, determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances and excursions:

Sect./Cond. #	Citation #	Source	Noncompliance	Monitoring Method(s)	Date	Duration	Corrective Action(s)
B / 007	(a)	General Requirement	Permittee did not comply with all conditions of this permit.	Company policy and our knowledge, information and belief formed after a reasonable inquiry, except as otherwise set forth in this certificate of compliance.	See below Deviations	See below Deviations	See below Corrective Actions
D/106	016	106	Miscellaneous caps missing from open-ended lines.	Visual inspection	3/18/15, 3/23/15, 4/2/15	N/A	Each missing cap was immediately replaced upon discovery of open-ended line.
D/107	017	107					


D/107	002(b)	107	Although Braskem does not own or operate the flare associated with these sources, a separate Braskem program did not exist to car seal valves in either the open or closed position to document that no potential flare bypasses occurred.	Routine operator rounds, safety procedures, and facility MOC process.	1/1/2015 – 4/30/2015	N/A	Braskem has implemented a monthly car seal inspection program. Necessary car seals will be inspected on a periodic basis to confirm correct position. Any maintenance which would require these car seals to be removed will be documented.
C	001	106	Release event which occurred was prohibited as air pollution as defined in 25 PAC 121.1 and 25 PAC 123.1.	Routine operator rounds, periodic cooling water sampling, and facility MOC process.	2/1/15	N/A	Facility personnel immediately investigated and then promptly initiated response actions including a shutdown of the unit to enable repair and to terminate the release event. Braskem has designed and implemented policies and procedures for incident reporting that are consistent with permit requirements.
C	002	106	Permittee did not provide sufficient notification to PADEP as defined in these citations.				
C	012(b)	106					
C	012(d)(3)	106					
D/108	007 009 013(a)	108	The facility did not perform the manufacturer's recommended weekly preventative	Facility preventative maintenance program and environmental task tracking system.	2/25/15	N/A	Facility was in a significant maintenance outage during this event. Additional training and communications were implemented to ensure all required preventative maintenance tasks



		Page		of		are completed regardless of the operation of the production facility.	
		maintenance for one isolated week in this reporting period.					
D/102A	002	102A	102A	6/30/15	N/A	On June 30, 2015 from approximately 1:37 pm to 2:25 pm there were isolated durations totaling approximately six minutes where the indication from all three flare pilot instruments was showing failure. During this period the facility was experiencing a process upset with a vent recovery compressor while also experiencing high wind gusts. All other flare operating requirements were in the normal operating range. Flare instrumentation and alarms continue to be calibrated and monitored on an established frequency. The emissions generated during this duration will be included in the facility's emission inventory report.	
D/102B	003	102B	102B				
D/103A	012	103A	103A				
D/103B	011	103B	103B				

Certification of Truth, Accuracy and Completeness

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate, and complete.

<b>Name:</b>	Conway Yee	<b>Title:</b>	Facility Manager
<b>Signed:</b>		<b>Date:</b>	3/31/16

*This certification must be signed by a responsible official. Any certification submitted without a valid signature will be returned.*

*The owner/operator shall identify any other material information needed in this certification to also comply with section 113(c)(2) of the Clean Air Act. If more spaces are needed, complete additional pages using the format shown in Addendum 1. This certification does not replace requirements pertaining to the submission of malfunction and CEM reports. DO NOT include that information on this form.*

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503] (Permit Renewal)	Section B	(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air M...	The renewal application was submitted to PADEP on 7/18/2013 and deemed administratively complete on 8/7/2013. All applicable information and fees were submitted with the renewal application.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermitent
[25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA] (Inspection and Entry)	Section B	(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:  (1) Enter at reasonable times upo...	A guard is on duty at the plant entrance during normal business hours to allow PADEP and its authorized representatives to enter the facility. Based upon knowledge, information, and belief, the facility never denied entrance to PADEP or its authorized representatives in this reporting period.  (c) Statement of law that imposes no compliance obligations and is thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermitent
[25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)] (Compliance Requirements)	Section B	(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:	First sentence of (a). With the possible exception of those terms and conditions identified below, emission units described in this permit were in compliance with all permit terms and conditions during the compliance review period.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermitent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		<p>(1) Enforcement action</p> <p>(2) Permit termination, revocation...</p>	<p>as determined by the required testing and monitoring in the permit.</p> <p>Second sentence of (a): Statement of law that imposes no compliance obligations and is thus not amenable to certification.</p> <p>Second sentence of (b): Braskem presumes that compliance with the operating and work practice standards incorporated into the Title V permit constitutes compliance with this requirement. With the possible exception of the deviations identified below, emission units described in this permit were in compliance with all permit terms and conditions in this permit over the previous year, as determined by all required testing and monitoring in the permit.</p> <p>The condition (c) is an explanatory statement that imposes no compliance obligations and is thus not amenable to certification.</p>	



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.411(d) & 127.512(c)(5)] (Duty to Provide Information)	Section B	(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.  (b) Upon request, the ...	PADep made a determination of the physical configurations or design details in applications for plan approvals/ installation permits and operating permits which are essential for compliance with the applicable requirements of the Title V permit. Therefore, no certification is required.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code § 127.541] (Significant Operating Permit Modifications)	Section B	When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541.	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.704, 127.705 & ...]	Section B	(a) The permittee shall pay fees to the Department in ...	Permit fees were paid according to the invoice provided by the	<input checked="" type="checkbox"/> Continuous

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
127.707]  (Fee Payment)		accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).  (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual...	Department.  Applicable annual Title V permit fees were paid by September 1 for the previous calendar year.  (c) Statements of law that impose no compliance obligations and are thus not amenable to certification.  (d) Statements of law that impose no compliance obligations and are thus not amenable to certification.  (e) Statements of law that impose no compliance obligations and are thus not amenable to certification.  (f) Statements of law that impose no compliance obligations and are thus not amenable to certification.	<input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.14(b) & 127.449]  (Authorization for De Minimis Emission	Section B	(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide	Plant changes are reviewed within the facility's Management of Change procedure.  There were no minor	<input checked="" type="checkbox"/> Continuous  <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Increases)		the Department with seven (7) days prior written ...	sources installed or deminimis increases of the mentioned minor sources during this compliance review period.  (f) Statements of law that impose no compliance obligations and are thus not amenable to certification.	
[25 Pa. Code §§ 127.11a & 127.215]  (Reactivation of Sources)	Section B	(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source wil...	There were no sources which were reactivated during this compliance review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 121.9 & 127.216]  (Circumvention)	Section B	(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction,...	There were no physical changes that would require a plan approval during this compliance review period.  The facility did not use a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which would conceal or dilute an emission of air contaminants which would otherwise be in violation of	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.402(d) & 127.513(1)] (Submissions)	Section B	(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:  Regional Air Program Manager PA Department of Environmental Protection  (At the address given on the permit transmittal letter, or otherwise notified)  (b) Any report...	All required submissions were submitted to the appropriate address of either PADEP or EPA.  All applications, forms, reports or compliance certifications submitted contained the required certification statement by the responsible official.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA] (Sampling, Testing and Monitoring Procedures)	Section B	(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable re...	Monitoring, analysis, testing, and sampling procedures specified by this permit were performed as needed. There were no additional applicable requirements promulgated under the Clean Air Act after permit issuance.  Monitoring, analysis, testing, and sampling procedures specified by	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §§ 127.511 & Chapter 135] (Recordkeeping Requirements)	Section B	(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:  (1) The date, place (as defined in the permit) and time of sampling or measurements.  (2) The dates the analyses were performed.  ...	this permit were conducted in accordance with the requirements of 25 Pa Code Chapter 139 or by the Clean Air Act, as needed.  Facility has maintained and made available, upon request of the Department, all records of required monitoring information.  Facility has maintained and made available, upon request of the Department, all records required to comply with reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)] (Reporting Requirements)	Section B	(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean ...	Facility has fulfilled all reporting requirements specified by this permit. Moreover, there were no additional applicable requirements promulgated under the Clean Air Act after permit issuance.  Reporting requirements specified by this permit were performed, as	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>needed, and contained the required certification statement by the responsible official.</p> <p>All applications, forms, reports or compliance certifications submitted contained the required certification statement by the responsible official.</p> <p>The first sentence of (d) imposes obligations on PADEP and is therefore not amenable to certification by Braskem. The second sentence is a statement of law.</p>	<input checked="" type="checkbox"/> Continuous  <input type="checkbox"/> Intermittent
<p>[25 Pa. Code § 127.513]</p> <p>(Compliance Certification)</p>	<p>Section B</p>	<p>(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, includi...</p>	<p>The certification report is intended to satisfy this requirement.</p> <p>All applications, forms, reports or compliance certifications submitted contained the required certification statement by the responsible official.</p>	<input checked="" type="checkbox"/> Continuous  <input type="checkbox"/> Intermittent
<p>[25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]</p>	<p>Section B</p>	<p>(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention</p>	<p>Braskem America, Inc. has developed &amp; implemented a Risk Management Plan (RMP).</p> <p>Braskem America, Inc. has</p>	<input checked="" type="checkbox"/> Continuous  <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Risk Management)		provisions) and the Federal Chemical Safety Information, Site S...	<p>prepared a written RMP meeting the requirements of 40 CFR Part 68. The original RMP was submitted to the EPA on or before June 21, 1999. A resubmittal of the RMP was submitted on June 17, 2004, June 15, 2009, and December 31, 2012. The most recent correction was completed May 4, 2015.</p> <p>(b) This is a historical requirement and imposes no specific requirements during the current period.</p> <p>(c) Statement of law that imposes no compliance obligations and is thus not amenable to certification.</p> <p>(d) In the cover letter for the facility's Annual Certification Report, the following statement was included:</p> <p>Facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).</p> <p>(e) Facility has maintained</p>	



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>records supporting implementation of accidental release program for the past five (5) years.</p> <p>(f) This is a historical requirement and imposes no specific requirements during the current compliance review period. Facility has registered and submitted RMP.</p>	<p><input type="checkbox"/> Continuous</p> <p><input checked="" type="checkbox"/> Intermittent</p>
<p>[25 Pa. Code §121.7] (Prohibition of air pollution.)</p>	<p>Section C - I. Restrictions - Emission Restriction(s)</p>	<p>No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. § 4003).</p>	<p>Release event which occurred on 2/1/15 was prohibited air pollution as defined in 25 PAC 121.1 and 25 PAC 123.1.</p> <p>Permittee did not provide sufficient notification to PADEP as defined in these citations.</p> <p>Facility personnel immediately investigated and then promptly initiated response actions including a shutdown of the unit to enable repair and to terminate the release event. Braskem has designed and implemented policies and procedures for incident</p>	



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §123.1] (Prohibition of certain fugitive emissions)	Section C - I. Restrictions - Emission Restriction(s)	<p>Except as permitted herein, no person may permit the emission into the outdoor atmosphere</p> <p>of a fugitive air contaminant from a source other than the following:</p> <p>(a) Construction or demolition of buildings or structures.</p> <p>(b) Grading, paving and maintenance of roads and streets.</p> <p>(c) Use of roads a...</p>	<p>reporting that are consistent with permit requirements.</p> <p>Release event which occurred on 2/1/15 was prohibited air pollution as defined in 25 PAC 121.1 and 25 PAC 123.1.</p> <p>Permittee did not provide sufficient notification to PADEP as defined in these citations.</p> <p>Facility personnel immediately investigated and then promptly initiated response actions including a shutdown of the unit to enable repair and to terminate the release event. Braskem has designed and implemented policies and procedures for incident reporting that are consistent with permit requirements.</p>	<p><input type="checkbox"/> Continuous</p> <p><input checked="" type="checkbox"/> Intermittent</p>
[25 Pa. Code §123.2] (Fugitive particulate matter)	Section C - I. Restrictions - Emission Restriction(s)	No person may permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section C, Condition # 002 if the emissions are visible at the point the emissions pass outside the person's property.	To control the emissions of fugitive particulate matter, the facility has work practices in place, in accordance with applicable regulatory	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>requirements for PM and as specified by individual Permit terms and conditions below. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event reporting process. Compliance review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices.</p>	
<p>[25 Pa. Code §123.31] (Limitations)</p>	<p>Section C - I. Restrictions - Emission Restriction(s)</p>	<p>A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.</p>	<p>To prevent the detection of malodors outside of the property, the facility has work practices in place, in accordance with applicable regulatory requirements and as specified by individual permit terms and conditions below. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections", the facility's</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			total event reporting process, and the hydrocarbon Leak Detection and Repair program. Compliance review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices.	
[25 Pa. Code §123.41] (Limitations)	Section C - I. Restrictions - Emission Restriction(s)	A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:  (a) Equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one (1) hour.  (b) Equ...	Performed weekly observations (modified Method 22) using "Odor and Fugitive Emissions" inspection form submitted to the Department for review/approval on 4/16/2009. Additionally, at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.42] (Exceptions)	Section C - I. Restrictions - Emission Restriction(s)	The emission limitations of 25 Pa. Code § 123.41 shall not apply when:  (a) The presence of uncombined water is the only reason for failure of the emission to meet the limitations;	Statements of law that impose no compliance obligations and are thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		(b) The emission results from the operation of equipment used solely to train and test persons in observing the opaci...		
[25 Pa. Code §129.14] (Open burning operations)	Section C - I. Restrictions - Emission Restriction(s)	No person may permit the open burning of material in an air basin, except where the open burning operations result from:  (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.  (2) A fire set for the purpose of inst...	Braskem did not conduct any of the listed fire exercises that required specific Department approval.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section C - II. Testing Requirements	(a) The Department reserves the right to require exhaust stack testing of any source(s) as necessary to verify emissions for purposes including determining the correct emission fee, malfunctions, or determining compliance with any applicable requirement.  (b) If at any time the Department has cause...	Statements of law that impose no compliance obligations and are thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.43] (Measuring techniques)	Section C - III. Monitoring Requirements	Visible emissions may be measured using either of the following:  (a) A device approved by the Department and maintained to	This is a historical requirement which imposes requirements during performance testing. When the facility measures visible emissions, such as during performance testing, a	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		<p>provide accurate opacity measurements.</p> <p>(b) Observers, trained and qualified, to measure plume opacity with the naked eye or with the aid of any devices approved by the Dep...</p>	<p>trained observer is used. Additionally, no quantitative measurements were required during this compliance review period, thus this requirement is not amenable to certification during this compliance review period.</p>	
<p>[25 Pa. Code §127.441] (Operating permit terms and conditions.)</p>	<p>Section C - III. Monitoring Requirements</p>	<p>(a) The permittee shall monitor the facility, once per operating day, for the following:</p> <p>(1) Odors which may be objectionable (as per 25 Pa. Code §123.31).</p> <p>(2) Visible Emissions (as per 25 Pa. Code §§123.41 and 123.42).</p> <p>(3) Fugitive Particulate Matter (as per 25 Pa. Code §§ 123.1 and 123.2).</p> <p>(...</p>	<p>To prevent the detection of malodors outside of the property, the facility has work practices in place, in accordance with applicable regulatory requirements and as specified by individual permit terms and conditions below. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections", the facility's total event reporting process, and the hydrocarbon Leak Detection and Repair program. Compliance review for this term consisted of a review by Braskem America, Inc.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>staff of the reports and records associated with these work practices.</p> <p>In the event odors or emissions are detected outside the facility, facility has work practices to report, investigate &amp; mitigate the incident. A permanent log of the "odor and visible emission inspections" forms are kept onsite.</p> <p>(c) Statement of law that imposes no compliance obligations and is thus not amenable to certification.</p>	
<p>[25 Pa. Code § 127.441] (Operating permit terms and conditions.)</p>	<p>Section C - IV. Recordkeeping Requirements</p>	<p>[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]</p> <p>(a) The permittee shall maintain a record of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviat...</p>	<p>Facility has work practices and procedures in place in accordance with applicable regulatory requirements and as specified by individual terms and conditions of this Permit. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimmitent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section C - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511(c).]  (a) The permittee shall submit the following reports:  (1) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year....	reporting process.  Facility submitted the necessary record formats to the Department for approval on 4/16/2009.  This certification report is intended to satisfy this requirement.  Release event which occurred on 2/1/15 was prohibited air pollution as defined in 25 PAC 121.1 and 25 PAC 123.1.  Permittee did not provide sufficient notification to PADEP as defined in these citations.  Facility personnel immediately investigated and then promptly initiated response actions including a shutdown of the unit to enable repair and to terminate the release event. Braskem has designed and implemented policies and procedures for incident reporting that are consistent with permit requirements.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[25 Pa. Code §135.3] (Reporting)	Section C - V. Reporting Requirements	(a) The owner or operator shall submit, by March 1 of each year, a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same...	Reports were submitted to the Department by March 1.  (b) Statement of law that imposes no compliance obligations and is thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code §123.1] (Prohibition of certain fugitive emissions)	Section C - VI. Work Practice Standards	For any source specified in Condition #002 of this Section, the permittee shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:  (a) Use, where possible, of water or chemicals for control of dust ...	To control the emissions of fugitive air contaminants, the facility has work practices in place, in accordance with applicable regulatory requirements for PM and as specified by individual terms and conditions of this permit. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event reporting process. Compliance review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[25 Pa. Code	Section C - VI. Work Practice Standards		Facility does not have any identified sources where	<input checked="" type="checkbox"/> Continuous

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
\$127.441] (Operating permit terms and conditions.)		(a) The permittee shall begin to immediately implement measures, which may include for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A, of th...	there was a required action to implement measures to reduce emissions.	<input type="checkbox"/> Intermittent
101A - PLANT 1, THREE STORAGE SILOS [25 Pa. Code §123.12] (Incinerators)	Section D - I. Restrictions - Emission Restriction(s)	No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.	Based on emissions calculations using the design specifications in the permit application, the particulate matter emissions do not exceed 0.04 grains per dry standard cubic foot.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
101A - PLANT 1, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  (a) The total Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant Number 1 shall be less than 37.10 tons per year on a twelve (12) month rolling basis.  (b) The polypropylene Plant Nu...	VOC emissions for the 101A silos are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 37.10 ton per 12 month rolling sum emission limit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
101A - PLANT 1, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and	Section D - I. Restrictions - Emission Restriction(s)	The total volatile organic compounds (VOC) emissions from the three (3) silos shall not exceed 12.10 tons on a 12-month rolling sum.	VOC emissions for the 101A silos are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 12.10 ton per 12 month rolling sum	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
101A - PLANT 1, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511] (a) The permittee shall monitor the polypropylene production on a monthly basis. (b) The permittee shall calculate the VOC emissions on a monthly basis and 12 month rolling sum, using DEP approved methods.	Production is tracked monthly; a 12-month rolling sum production rate is calculated and compared to the production limit. VOC emissions calculated using November 2011 Plant 2 storage silos stack test results.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
101A - PLANT 1, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511] The permittee shall keep records of (a) the monthly polypropylene production. (b) the VOC emissions calculated monthly and 12-month rolling sum.	12-month rolling summation of production is tracked monthly. VOC emissions calculations are kept on file.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
101A - PLANT 1, THREE STORAGE SILOS [40 CFR Part 60 Standards of Performance for	Section D - VII. Additional Requirements	The silos are not subject to the provisions of 40 C.F.R. 60 Subpart DDD, as per the definition of 'commenced' in 40 C.F.R. §60.2, and the applicability specified in 40 C.F.R. §60.560(b)(1)(ii).	Statement of law not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
New Stationary Sources §40 CFR 60.560]				
(Applicability and designation of affected facilities.)				
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §123.13] (Processes)	Section D - I. Restrictions - Emission Restriction(s)	No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.	Based on emissions calculations using the design specifications in the permit application, the particulate matter emissions do not exceed 0.04 grains per dry standard cubic foot.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  (a) The combined Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant No.2 shall not exceed 24.30 tons per year on a twelve (12) month rolling basis.  (b) The combined Particulate Mat...	VOC and PM emissions for the 101B silos are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 24.3 ton and 2.1 ton per 12 month rolling sum emission limit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit	Section D - I. Restrictions - Emission Restriction(s)	VOC emissions from the three silos shall not exceed 1.06 pounds per hour and 4.64 tons per year as 12-month rolling sum.	VOC emissions for the 101B silos are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
terms and conditions.)			against the 1.06 lb/hr and 4.64 ton per 12 month rolling sum emission limit.	
101B - PLANT 2, THREE STORAGE SILOS [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.560] (Applicability and designation of affected facilities.)	Section D - I. Restrictions - Emission Restriction(s)	In order for this source to not be subject to 40 C.F.R. Part 60 Subpart DDD, the actual weight percent total organic compound (TOC) emissions from the silos shall be less than 0.10 percent as per 40 C.F.R. §60.650(g).	A representative test was conducted on 1/12/2011 of source 101B which demonstrates this requirement.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code §127.511] (a) The permittee shall monitor the polypropylene production monthly. (b) The permittee shall calculate the VOC and PM emissions monthly and 12 month rolling sum, using Department approved methods.	12-month rolling summation of production is tracked monthly. 12- month rolling summation of PM and VOC emissions is tracked monthly.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
101B - PLANT 2, THREE STORAGE SILOS [25 Pa. Code	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code §127.511]	12-month rolling summation of production is tracked monthly. 12- month rolling summation	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
§127.441] (Operating permit terms and conditions.)		The permittee shall keep records of  (a) the polypropylene production monthly.  (b) the VOC and PM emission calculations monthly and 12 month rolling sum.	of PM and VOC emissions is tracked monthly.	
102A - PLANT 1 POLYPROPYLENE MFG SOURCES  [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  (a) The total Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant Number 1 shall be less than 37.10 tons per year on a twelve (12) month rolling basis.  (b) The polypropylene Plant Nu...	VOC emissions for the 102A sources are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 37.1 ton per 12 month rolling sum emission limit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-1] (Standards: Process emissions.)	Section D - I. Restrictions - Control Device Efficiency Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  (a) As per 40 C.F.R. §§60.18(c), and 60.562-1(a)(1)(i)(C) , the continuous and intermittent emission streams from the process shall be vented and combusted in the flare that is:  (1) operated with no vi...	Facility has work practices and procedures in place in accordance with applicable regulatory and as specified by individual terms and conditions of this Permit. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>reporting process.</p> <p>Thermocouples on the flare to monitor for the presence of a pilot flame and flare flame detector were installed and are monitored. Process control systems in place that both alarm and automatically re-ignite flare pilots as needed.</p> <p>Performed weekly observations (modified Method 22) using "Odor and Fugitive Emissions" inspection form submitted to the Department on 4/16/2009. Additionally, at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking.</p> <p>The facility measures flare BTU value using a flare gas analyzer.</p> <p>On June 30, 2015 from approximately 1:37 pm to 2:25 pm there were isolated durations totaling approximately six minutes</p>	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>where the indication from all three flare pilot instruments was showing failure. During this period the facility was experiencing a process upset with a vent recovery compressor while also experiencing high wind gusts. All other flare operating requirements were in the normal operating range. Flare instrumentation and alarms continue to be calibrated and monitored on an established frequency. The emissions generated during this duration will be included in the facility's emission inventory report.</p> <p>Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity.</p> <p>Braskem America has chosen to comply with the car seal option to prevent vent streams from</p>	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
102A - PLANT 1 POLYPROPYLENE MFG SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.564]  (Test methods and procedures.)	Section D - II. Testing Requirements	(a) In conducting the performance tests required in 40 C.F.R. §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 C.F.R. Part 60 or other methods and procedures specified in 40 C.F.R. §60.564, except as provided under 40 C.F.R. §60.8(b).  (1) W...	There were no performance tests for this source required under 40 CFR 60.8 during this compliance review period; thus this requirement is not amenable to certification during this compliance review period. No changes were made in the process which would require an additional performance test during this review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  (a) The permittee shall monitor the polypropylene production on a monthly basis.  (b) The permittee shall calculate the VOC emissions on a monthly basis and 12 month rolling sum, using DEP approved methods.	12-month rolling summation of production is tracked monthly. 12-month rolling summation of VOC emissions is tracked monthly.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES  [40 CFR Part 60 Standards of	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  (a) As per 40 C.F.R. §60.563(a)(2) and (3), the permittee shall	The thermocouples on the flare monitoring for the presence of a pilot flame and flare flame detector were installed, calibrated, maintained, and operated	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Performance for New Stationary Sources \$40 CFR 60.563]  (Monitoring requirements.)		calibrate, maintain, and operate according to manufacturer's specifications the monitoring systems as follows:  (1) A flame monitoring device t...	according to manufacturer's specifications and/or good engineering practices.  Thermocouples on the flare to monitor for the presence of a pilot flame and flare flame detector were installed and are monitored.  Flare is part of the operator surveillance program and is inspected and maintained as part of plant turnaround work practices.  Braskem America, Inc. has chosen to comply with the car seal option. A monthly car seal inspection program is in place.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  The permittee shall keep records of  (a) the monthly polypropylene production.	12-month rolling summation of production is tracked monthly. 12-month rolling summation of VOC emissions is tracked monthly.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>102A - PLANT 1 POLYPROPYLENE MFG SOURCES</p> <p>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565]</p> <p>(Reporting and recordkeeping requirements.)</p>	<p>Section D - IV. Recordkeeping Requirements</p>	<p>(b) the VOC emissions calculated monthly and 12-month rolling sum.</p> <p>[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]</p> <p>(a) As per 40 C.F.R. §60.565(a)(3), the permittee shall keep an up-to-date, readily-accessible record of the following information measured during each flare performance test, and shall include the following...</p>	<p>The following records are available in the performance test (4/9/2002): All visible emission readings, heat content determinations, flow rate measurements, and exit velocity determinations; continuous records of the pilot flame and records of all periods of operations during which the pilot flame is absent. Control device was operating continuously during the performance test.</p> <p>Changes such as production capacity, feedstock type, or catalyst type, or of any replacement, removal or addition of product recovery equipment, are documented within the facility's Management of Change records. Performance test results are maintained in the facility environmental files.</p> <p>(d), Statement of law that</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565] (Reporting and recordkeeping requirements.)	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  The permittee shall submit to the Administrator semiannual reports of the following recorded information.  (a) All periods recorded under 40 C.F.R. §60.565(b) when the vent stream has been diverted from the ...	Imposes no compliance obligations and are thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
102A - PLANT 1 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.560] (Applicability and designation of affected facilities.)	Section D - VII. Additional Requirements	Emergency vent streams, as defined in 40 C.F.R. 60.561, are exempt from the requirements of 40 C.F.R. 60.562-1(a)(2) as per 40 C.F.R. 60.560(h).	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
102B - PLANT 2 POLYPROPYLENE	Section D - I. Restrictions -	[Additional authority for this permit condition is also derived from	VOC and PM emissions for the 102B sources are	<input checked="" type="checkbox"/> Continuous



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
MFG SOURCES  [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Emission Restriction(s)	25 Pa. Code § 127.512(h).]  (a) The combined Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant No.2 shall not exceed 24.30 tons per year on a twelve (12) month rolling basis.  (b) The combined Particulate Matt...	calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 24.3 ton and 2.1 ton per 12 month rolling sum emission limit.	<input type="checkbox"/> Intermittent
102B - PLANT 2 POLYPROPYLENE MFG SOURCES  [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Throughput Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  The production rate of Polypropylene Plant Number 2 is limited to a maximum of 240,900 tons of polypropylene per year on a twelve (12) month rolling basis.	Production is tracked monthly, a 12-month rolling sum production rate is calculated and compared to the production limit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
102B - PLANT 2 POLYPROPYLENE MFG SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-1] (Standards: Process emissions.)	Section D - I. Restrictions - Control Device Efficiency Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  (a) As per 40 C.F.R. §§60.18(c), and 60.562-1(a)(1)(i)(C), the continuous and intermittent emission streams from the process shall be vented and combusted in the flare that is:  (1) operated with no vi...	Facility has work practices and procedures in place in accordance with applicable regulatory and as specified by individual terms and conditions of this Permit. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>reporting process.</p> <p>Thermocouples on the flare to monitor for the presence of a pilot flame and flare flame detector were installed and are monitored. Process control systems in place that both alarm and automatically re-ignite flare pilots as needed.</p> <p>Performed weekly observations (modified Method 22) using "Odor and Fugitive Emissions" inspection form submitted to the Department on 4/16/2009. Additionally, at the flare, an automated system is in place to measure the propensity of the flame to smoke and add steam to mitigate smoking.</p> <p>The facility measures flare BTU value using a flare gas analyzer.</p> <p>On June 30, 2015 from approximately 1:37 pm to 2:25 pm there were isolated durations totaling approximately six minutes</p>	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>where the indication from all three flare pilot instruments was showing failure. During this period the facility was experiencing a process upset with a vent recovery compressor while also experiencing high wind gusts. All other flare operating requirements were in the normal operating range. Flare instrumentation and alarms continue to be calibrated and monitored on an established frequency. The emissions generated during this duration will be included in the facility's emission inventory report.</p> <p>Flare exit velocity is measured using a dedicated flare flow meter. Facility records are maintained for the net heating value and the exit velocity.</p> <p>Braskem America has chosen to comply with the car seal option to prevent vent streams from</p>	



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.564]  (Test methods and procedures.)	Section D - II. Testing Requirements	(a) In conducting the performance tests required in 40 C.F.R. §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 C.F.R. Part 60 or other methods and procedures specified in 40 C.F.R. §60.564, except as provided under 40 C.F.R. §60.8(b).  (1) W...	bypassing the flare.  There were no performance tests for this source required under 40 CFR 60.8 during this compliance review period; thus this requirement is not amenable to certification during this compliance review period. No changes were made in the process which would require an additional performance test during this review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interim
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code §127.511]  (a) The permittee shall monitor the polypropylene production monthly.  (b) The permittee shall calculate the VOC and PM emissions monthly and 12 month rolling sum, using Department approved methods.	Polypropylene production is monitored monthly.  12-month rolling summation of PM and VOC emissions are kept on file.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interim
102B - PLANT 2 POLYPROPYLENE MFG SOURCES [40 CFR Part 60 Standards of	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  (a) As per 40 C.F.R. §60.563(a)(2) and (3), the permittee shall	The thermocouples on the flare monitoring for the presence of a pilot flame and flare flame detector were installed, calibrated, maintained, and operated	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interim

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Performance for New Stationary Sources §40 CFR 60.563]  (Monitoring requirements.)		calibrate, maintain, and operate according to manufacturer's specifications the monitoring systems as follows:  (1) A flame monitoring device t...	according to manufacturer's specifications and/or good engineering practices.  Thermocouples on the flare to monitor for the presence of a pilot flame and flare flame detector were installed and are monitored.  Flare is part of the operator surveillance program and is inspected and maintained as part of plant turnaround work practices.  Braskem America, Inc. has chosen to comply with the car seal option. A monthly car seal inspection program is in place.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
102B - PLANT 2 POLYPROPYLENE MFG SOURCES  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code §127.511]  The permittee shall keep records of  (a) the polypropylene production monthly.	Polypropylene production is monitored monthly.  12-month rolling summation of PM and VOC emissions are kept on file.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
102B - PLANT 2 POLYPROPYLENE MFG SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565]  (Reporting and recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	(b) the VOC and PM emission calculations monthly and 12 month rolling sum.  [Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  (a) As per 40 C.F.R. §60.565(a)(3), the permittee shall keep an up-to-date, readily-accessible record of the following information measured during each flare performance test, and shall include the following...	The following records are available in the performance test (4/9/2002): All visible emission readings, heat content determinations, flow rate measurements, and exit velocity determinations; continuous records of the pilot flame and records of all periods of operations during which the pilot flame is absent. Control device was operating continuously during the performance test.  Changes such as production capacity, feedstock type, or catalyst type, or of any replacement, removal or addition of product recovery equipment, are documented within the facility's Management of Change records. Performance test results are maintained in the facility environmental files.  (d) Statement of law that	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
102B - PLANT 2 POLYPROPYLENE MFG SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565]  (Reporting and recordkeeping requirements.)	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  The permittee shall submit to the Administrator semiannual reports of the following recorded information.  (a) All periods recorded under 40 C.F.R. §60.565(b) when the vent stream has been diverted from the ...	Facility has submitted semiannual reports required under this condition.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
102B - PLANT 2 POLYPROPYLENE MFG SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.560]  (Applicability and designation of affected facilities.)	Section D - VII. Additional Requirements	Emergency vent streams, as defined in 40 C.F.R. 60.561, are exempt from the requirements of 40 C.F.R. 60.562-1(a)(2) as per 40 C.F.R. 60.560(h).	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103A - PLANT 1 FUGITIVE	Section D - I. Restrictions -	[Additional authority for this permit condition is also derived from	Facility has a leak detection and repair	<input checked="" type="checkbox"/> Continuous

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
SOURCES  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Emission Restriction(s)	25 Pa. Code § 127.512(h).]  (a) The total Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant Number 1 shall be less than 37.10 tons per year on a twelve (12) month rolling basis.  (b) The polypropylene Plant Nu...	program (work practice) to limit fugitive emissions.  VOC emissions for the 103A sources are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 37.1 ton 12 month rolling sum emission limit.	<input type="checkbox"/> Intermittent
103A - PLANT 1 FUGITIVE SOURCES  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  The Volatile Organic Compounds (VOC) emissions from the fugitive emission sources of Plant 1 shall not exceed 19.60 tons per year on a twelve (12) month rolling basis.	Facility has a leak detection and repair program (work practice) to limit fugitive emissions.  VOC emissions for the 103A sources are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 19.6 ton 12 month rolling sum emission limit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103A - PLANT 1 FUGITIVE SOURCES  [40 CFR Part 60 Standards of	Section D - II. Testing Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(d).]  (a) In conducting the performance tests required in §60.8, the permittee shall use as reference methods and procedures the	There were no performance tests required under 40 CFR 60.8 during this compliance review period; thus this requirement is not	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>Performance for New Stationary Sources §40 CFR 60.485]</p> <p>(Test methods and procedures.)</p>		<p>test methods in appendix A of 40 C.F.R. part 60 or other methods and procedures as specified in 40...</p>	<p>amenable to certification during this compliance review period.</p> <p>The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement.</p> <p>Elaborate if cal records not found</p> <p>The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the background level. All potential leak interfaces are traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is</p>	



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>compared with 500 ppm for determining compliance.</p> <p>For equipment that is added, engineering judgment is used to confirm the VOC content. When this determination concludes that the piece of equipment is in VOC service, it is added to the facility's LDAR program.</p> <p>Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components.</p> <p>There were no samples collected during the current compliance period and thus, imposes no obligations during the current compliance review</p>	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
103A - PLANT 1 FUGITIVE SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  (a) The permittee shall monitor the polypropylene production on a monthly basis.  (b) The permittee shall calculate the VOC emissions on a monthly basis and 12 month rolling sum, using DEP approved methods.	period.  Polypropylene production is monitored monthly.  12-month rolling summation of VOC emissions are kept on file.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103A - PLANT 1 FUGITIVE SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  (a) The permittee shall monitor the necessary parameters using procedures or criteria approved by the Department to determine the VOC emissions, monthly.	VOC emissions are calculated monthly, as well as the 12-month rolling summation.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-2]	Section D - III. Monitoring Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 C.F.R. §60.485(b), except as provided in 40 C.F.R. §60.482-1(c) and (f) and paragraphs (d), (e), and (f) o...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  Facility is claiming an exemption under (f) the closed vent system	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Standards: Pumps in light liquid service.)			condition for five pumps.	
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-7] (Standards: Valves in gas/vapor service in light liquid service.)	Section D - III. Monitoring Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 C.F.R. §60.485(b) and shall comply with paragraphs (b) through (e) of 40 C.F.R. §60.482-7, except as provided in paragraphs (f),....	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  All leaks were repaired within 15 calendar days or placed on delay of repair.  (e) Statement of law that impose no compliance obligations and are thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103A - PLANT 1 FUGITIVE SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  The permittee shall keep records of  (a) the monthly polypropylene production.  (b) the VOC emissions calculated monthly and 12-month rolling sum.	Polypropylene production is monitored monthly.  12-month rolling summation of VOC emissions are kept on file.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>103A - PLANT 1 FUGITIVE SOURCES</p> <p>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.486]</p> <p>(Recordkeeping requirements.)</p>	<p>Section D - IV. Recordkeeping Requirements</p>	<p>[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(e).]</p> <p>(a)(1) The permittee shall comply with the recordkeeping requirements of 40 C.F.R. §60.486.</p> <p>(2) The permittee may comply with the recordkeeping requirements for the sources in one recordkeeping system if the system iden...</p>	<p>This condition imposes no additional requirements than those conditions elsewhere in this Section.</p> <p>Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program</p> <p>Facility has work practices and procedures in place, including marked-up P&amp;IDs showing equipment in VOC service, as well as equipment not in VOC service.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>103A - PLANT 1 FUGITIVE SOURCES</p> <p>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.487]</p> <p>(Reporting requirements.)</p>	<p>Section D - V. Reporting Requirements</p>	<p>[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(e).]</p> <p>(a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 C.F.R. §60.486:</p> <p>(1) Process unit identification.</p>	<p>Facility submitted semiannual reports as required by this condition</p> <p>This is a historical requirement and imposes no specific requirements during the current period.</p> <p>There were no performance tests conducted during the compliance review period.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
103A - PLANT 1 FUGITIVE SOURCES	Section D - VI. Work Practice Standards	(2) For each month during the semiannual reporting period...  [Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-1]  (Standards: General.)		(a) The permittee shall demonstrate compliance with the requirements of 40 C.F.R. §§60.482-1 through 60.482-10 or §60.480(e) for all equipment.  (b) Compliance with 40 C.F.R. §§60.482-1 to 60.482-10 will be determined b...	(c) Statement of law that imposes no compliance obligations and is thus not amenable to certification. Additionally, the facility has chosen not to apply for a determination of equivalency during the current compliance period.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent
103A - PLANT 1 FUGITIVE SOURCES	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Closed vent systems and control devices must comply with the respective provisions specified in 40 C.F.R. § 60.482-10.  (b) As per 40 C.F.R. §60.482-10(f), except as provided in paragraphs (i) through (k) of this sec...	Except as reported and submitted in this compliance certification or previous semi-annual deviation reports required by this permit, the flare is operated and maintained in compliance with 40 CFR 60.18. Flare is part of the operator surveillance program and is inspected and maintained as part of plant turnaround work practices. The closed vent system is part of the facility LDAR Program. Inspections under the	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent
(Standards: Closed vent systems and control devices.)				

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>facility's mechanical integrity program were conducted during this compliance review period. The closed vent system is in continuous operations when emissions may be vented through it.</p> <p>On June 30, 2015 from approximately 1:37 pm to 2:25 pm there were isolated durations totaling approximately six minutes where the indication from all three flare pilot instruments was showing failure. During this period the facility was experiencing a process upset with a vent recovery compressor while also experiencing high wind gusts. All other flare operating requirements were in the normal operating range. Flare instrumentation and alarms continue to be calibrated and monitored on an established frequency. The emissions generated during this duration will be included in the facility's emission</p>	



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
103A - PLANT 1 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-3] (Compressors.)	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 C.F.R. §60.482-1(c) and paragraphs (h), (i), and ...	inventory report.  Except for compressors which are controlled by 40 CFR § 60.482-10, and compressors that have no detectable emissions and are subject to 40 CFR 60.482-3(i), all remaining compressors are either equipped with a barrier fluid system that prevents leakage of VOC to the atmosphere or are vented to a control device.  The AC compressors are operated with the barrier fluid at a pressure greater than the compressor stuffing box pressure.  The barrier fluid systems are in heavy liquid service (mineral oil).  The barrier fluid systems are equipped with a sensor (low oil level) that will detect failure of the seal system and/or the barrier fluid system.  The barrier fluid systems are equipped with alarms to indicate failure of the	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>seal system and/or the barrier fluid system. The criterion used to indicate failure of the seal system is a low oil level alarm.</p> <p>(f) Statement of law that impose no compliance obligations and are thus not amenable to certification</p> <p>Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.</p> <p>The (2) Sulzer compressors (vent recovery) are closed system and vent to the flare and are therefore exempt from the requirements of paragraphs (a) and (b) of this condition.</p> <p>The facility did not exempt any compressors based on this condition during the compliance review period.</p>	
103A - PLANT 1 FUGITIVE	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R.	Facility has work practices and procedures in place,	<input checked="" type="checkbox"/> Continuous

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<b>SOURCES</b>  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-4]  (Standards: Pressure relief devices in gas/vapor service.)		\$60.562-2(a).]  (a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determ...	including VOC monitoring reports maintained as part of the facility LDAR Program.  All leaks were repaired within 5 calendar days or placed on delay of repair.	<input type="checkbox"/> Intermittent
<b>103A - PLANT 1 FUGITIVE SOURCES</b>  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-5]  (Standards: Sampling connection systems.)	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 C.F.R. §60.482-1(c) and paragraph (c) of 40 C.F.R. §60.482-5.  (b) Each closed-purge...	Sampling connection systems are equipped with a closed purge system.  The closed purge system is designed to capture and transport the purged fluid to a control device.  The facility did not exempt any sampling systems based on this condition during the compliance review period.	<input checked="" type="checkbox"/> Continuous  <input type="checkbox"/> Intermittent
<b>103A - PLANT 1 FUGITIVE SOURCES</b>  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-5]	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a)(1) Each open-ended valve or line shall be equipped with a	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	<input checked="" type="checkbox"/> Continuous  <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Sources §40 CFR 60.482-6]  (Standards: Open-ended valves or lines.)		cap, blind flange, plug, or a second valve, except as provided in 40 C.F.R. §60.482-1(c) and paragraphs (d) and (e) of 40 C.F.R. §60.482-6.  (2) The cap, blind...		
103A - PLANT 1 FUGITIVE SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-8]  (Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors.)	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and ...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  All leaks were repaired within 15 calendar days or placed on delay of repair.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103A - PLANT 1 FUGITIVE SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR	Section D - VII. Additional Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  (b) Statement of law that impose no compliance	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
60.482-9] (Standards: Delay of repair.)		infeasible without a process unit shutdown. Repair of this equipment shall occur before the end ...	obligations and are thus not amenable to certification  Facility has not chosen to utilize this exemption for repair during this compliance review period.	
103A - PLANT 1 FUGITIVE SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-2]  (Standards: Equipment leaks of VOC.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  (a) As per 40 C.F.R. §60.562-2(a), the permittee shall comply with the requirements specified in 40 C.F.R. §§60.482-1 through 60.482-10.  (b) As per 40 C.F.R. §60.562-2(d), the permittee shall comply wit...	This is a historical requirement and imposes no specific requirements during the current period. LDAR program was instituted at startup.  The facility adheres to LDAR work practice for recordkeeping and reporting consistent with 40 CFR 60.485, 60.486, and 60.487.	<input checked="" type="checkbox"/> Continuous  <input type="checkbox"/> Intermittent
103B - PLANT 2 FUGITIVE SOURCES  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - I. Restrictions - Emission Restriction(s)	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  (a) The combined Volatile Organic Compounds (VOC) emissions from the Polypropylene Plant No.2 shall not exceed 24.30 tons per year on a twelve (12) month rolling basis.  (b) The combined Particulate Matt...	VOC emissions for the 103B sources are calculated monthly using approved emission calculation methodologies. A 12-month rolling sum is determined and compared against the 24.3 ton and 2.1 ton 12 month rolling sum emission limit.	<input checked="" type="checkbox"/> Continuous  <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>103B - PLANT 2 FUGITIVE SOURCES</p> <p>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.485]</p> <p>(Test methods and procedures.)</p>	<p>Section D - II. Testing Requirements</p>	<p>[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(d).]</p> <p>(a) In conducting the performance tests required in §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 C.F.R. part 60 or other methods and procedures as specified in 40...</p>	<p>There were no performance tests required under 40 CFR 60.8 during this compliance review period; thus this requirement is not amenable to certification during this compliance review period.</p> <p>The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement.</p> <p>The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the background level. All potential leak interfaces are traversed as close to the interface as possible. The arithmetic difference between the maximum</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance.</p> <p>Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components.</p> <p>For equipment that is added, engineering judgment is used to confirm the VOC content. When this determination concludes that the piece of equipment is in VOC service, it is added to the facility's LDAR program.</p> <p>There were no samples collected during the current compliance period and thus, imposes no</p>	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
103B - PLANT 2 FUGITIVE SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code §127.511]  (a) The permittee shall monitor the polypropylene production monthly.  (b) The permittee shall calculate the VOC and PM emissions monthly and 12 month rolling sum, using Department approved methods.	obligations during the current compliance review period.  Polypropylene production is monitored monthly.  12-month rolling summation of VOC and PM emissions are kept on file.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103B - PLANT 2 FUGITIVE SOURCES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  The permittee shall monitor the necessary parameters using procedures or criteria approved by the Department to determine the VOC emissions.	VOC emissions are calculated monthly, as well as the 12-month rolling summation.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR	Section D - III. Monitoring Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 C.F.R. §60.485(b), except as provided in 40 C.F.R. §60.482-1(c) and (f)	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program  Facility is not claiming an exemption under this	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
60.482-2]  (Standards: Pumps in light liquid service.)		and paragraphs (d), (e), and (f) o...	condition (d), thus this is not amenable to certification during this compliance review period.  Facility is claiming an exemption (f) under the closed vent system condition for five pumps.	
103B - PLANT 2 FUGITIVE SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-7]  (Standards: Valves in gas/vapor service in light liquid service.)	Section D - III. Monitoring Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 C.F.R. §60.485(b) and shall comply with paragraphs (b) through (e) of 40 C.F.R. §60.482-7, except as provided in paragraphs (f),...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  All leaks were repaired within 15 calendar days or placed on delay of repair.  (e) Statement of law that imposes no compliance obligations and is thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103B - PLANT 2 FUGITIVE SOURCES  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code §127.511]  The permittee shall keep records of  (a) the polypropylene production monthly.	Polypropylene production is monitored monthly.  12-month rolling summation of VOC and PM emissions are kept on file.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
103B - PLANT 2 FUGITIVE SOURCES	Section D - IV. Recordkeeping Requirements	(b) the VOC and PM emission calculations monthly and 12 month rolling sum.  [Authority for this permit condition is derived from 40 C.F.R. §60.562-2(e).]	This condition imposes no additional requirements than those conditions elsewhere in this Section.  Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.486]  (Recordkeeping requirements.)		(a)(1) The permittee shall comply with the recordkeeping requirements of 40 C.F.R. §60.486.  (2) The permittee may comply with the recordkeeping requirements for the sources in one recordkeeping system if the system iden...	Facility has work practices and procedures in place, including marked-up P&IDs showing equipment in VOC service, as well as equipment not in VOC service.  Statement of law that impose no compliance obligations and are thus not amenable to certification during this compliance review period	
103B - PLANT 2 FUGITIVE SOURCES	Section D - V. Reporting Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(e).]	Facility submitted semiannual reports as required by this condition  This is a historical	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[40 CFR Part 60				

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Standards of Performance for New Stationary Sources §40 CFR 60.487]  (Reporting requirements.)		(a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 C.F.R. §60.486:  (1) Process unit identification.  (2) For each month during the semiannual reporting period...	requirement and imposes no specific requirements during the current period.  There were no performance tests conducted during the compliance review period.	
103B - PLANT 2 FUGITIVE SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-1]  (Standards: General.)	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) The permittee shall demonstrate compliance with the requirements of 40 C.F.R. §§60.482-1 through 60.482-10 or §60.480(e) for all equipment.  (b) Compliance with 40 C.F.R. §§60.482-1 to 60.482-10 will be determined b...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  (b) Statement of law that imposes no compliance obligations and is thus not amenable to certification. Additionally, the facility has chosen not to apply for a determination of equivalency during the current compliance period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103B - PLANT 2 FUGITIVE SOURCES  [40 CFR Part 60 Standards of	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]	Except as reported and submitted in this compliance certification or previous semi-annual deviation reports required by this permit, the flare is	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>Performance for New Stationary Sources §40 CFR 60.482-10]</p> <p>(Standards: Closed vent systems and control devices.)</p>		<p>(a) Closed vent systems and control devices must comply with the respective provisions specified in 40 C.F.R. § 60.482-10.</p> <p>(b) As per 40 C.F.R. §60.482-10(f), except as provided in paragraphs (i) through (k) of this sec...</p>	<p>operated and maintained in compliance with 40 CFR 60.18. Flare is part of the operator surveillance program and is inspected and maintained as part of plant turnaround work practices. The closed vent system is part of the facility LDAR Program. Inspections under the facility's mechanical integrity program were conducted during this compliance review period. The closed vent system is in continuous operations when emissions may be vented through it.</p> <p>On June 30, 2015 from approximately 1:37 pm to 2:25 pm there were isolated durations totaling approximately six minutes where the indication from all three flare pilot instruments was showing failure. During this period the facility was experiencing a process upset with a vent recovery compressor while also experiencing high wind gusts. All other flare operating requirements</p>	



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>103B - PLANT 2 FUGITIVE SOURCES</p> <p>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-3] (Compressors.)</p>	<p>Section D - VI. Work Practice Standards</p>	<p>[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]</p> <p>(a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 C.F.R. §60.482-1(c) and paragraphs (h), (i), and ...</p>	<p>were in the normal operating range. Flare instrumentation and alarms continue to be calibrated and monitored on an established frequency. The emissions generated during this duration will be included in the facility's emission inventory report.</p> <p>Except for compressors which are controlled by 40 CFR § 60.482-10; and compressors that have no detectable emissions and are subject to 40 CFR 60.482-3(i), all remaining compressors are either equipped with a barrier fluid system that prevents leakage of VOC to the atmosphere or are vented to a control device.</p> <p>The AC compressors are operated with the barrier fluid at a pressure greater than the compressor stuffing box pressure.</p> <p>The barrier fluid systems are in heavy liquid service (mineral oil).</p>	<p><input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>The barrier fluid systems are equipped with a sensor (low oil level) that will detect failure of the seal system and/or the barrier fluid system.</p> <p>The barrier fluid systems are equipped with alarms to indicate failure of the seal system and/or the barrier fluid system. The criterion used to indicate failure of the seal system is a low oil level alarm.</p> <p>(f) Statement of law that impose no compliance obligations and are thus not amenable to certification</p> <p>Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.</p> <p>The (2) Sulzer compressors (vent recovery) are closed system and vent to the flare and are therefore exempt from the requirements of</p>	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
103B - PLANT 2 FUGITIVE SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-4]  (Standards: Pressure relief devices in gas/vapor service.)	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determ...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  All leaks were repaired within 5 calendar days or placed on delay of repair.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103B - PLANT 2 FUGITIVE SOURCES  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-5]  (Standards: Sampling connection	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 C.F.R. §60.482-1(c) and paragraph (c) of 40 C.F.R. §60.482-5.	Sampling connection systems are equipped with a closed purge system.  The closed purge system is designed to capture and transport the purged fluid to a control device.  The facility did not exempt any sampling systems based on this condition during the compliance	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
103B - PLANT 2 FUGITIVE SOURCES	Section D - VI. Work Practice Standards	(b) Each closed-purge...	review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermitent
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-6]		(a)(1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 C.F.R. §60.482-1(c) and paragraphs (d) and (e) of 40 C.F.R. §60.482-6.  (2) The cap, blin...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermitent
(Standards: Open-ended valves or lines.)				
103B - PLANT 2 FUGITIVE SOURCES	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  (b) Statement of law that impose no compliance obligations and are thus not amenable to certification	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermitent
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-8]		(a) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and ...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program. All leaks were	
(Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors.)				

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-9]  (Standards: Delay of repair.)	Section D - VII. Additional Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end ...	repaired within 15 calendar days or placed on delay of repair.  Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  (b) Statement of law that impose no compliance obligations and are thus not amenable to certification  Facility has not chosen to utilize this exemption for repair during this compliance review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
103B - PLANT 2 FUGITIVE SOURCES [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-2]  (Standards: Equipment leaks of VOC.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  (a) As per 40 C.F.R. §60.562-2(a), the permittee shall comply with the requirements specified in 40 C.F.R. §§60.482-1 through 60.482-10.  (b) As per 40 C.F.R. §60.562-2(d), the permittee shall comply wit...	This is a historical requirement and imposes no specific requirements during the current period. LDAR program was instituted at startup.  Facility has chosen not to elect this option during the current compliance period. Facility has chosen not to apply for a determination of equivalency during the	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			current compliance period.	
<p>105 - MAINTENANCE PARTS WASHER</p> <p>[25 Pa. Code §129.63]</p> <p>(Degreasing operations)</p>	<p>Section D - I. Restrictions - Emission Restriction(s)</p>	<p>(a) The permittee shall not use any solvent with a vapor degreaser of 1.0 millimeter of mercury (mmHg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.</p> <p>(b) Paragraph (a) does not apply:</p> <p>(i) To cold cleaning machines used in extreme cleaning ...</p>	<p>Facility maintains MSDS's for the material used in this equipment which demonstrates the adherence to the vapor pressure and VOC content requirements. Facility has replaced solvent based unit with aqueous based unit.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>105 - MAINTENANCE PARTS WASHER</p> <p>[25 Pa. Code §127.441]</p> <p>(Operating permit terms and conditions.)</p>	<p>Section D - III. Monitoring Requirements</p>	<p>The permittee shall monitor and record the solvent usage on a monthly basis.</p>	<p>Records of the MSDS and waste manifest are maintained onsite. Facility has replaced solvent based unit with aqueous based unit.</p>	<p><input type="checkbox"/> Continuous</p> <p><input checked="" type="checkbox"/> Intermittent</p>
<p>105 - MAINTENANCE PARTS WASHER</p> <p>[25 Pa. Code</p>	<p>Section D - IV. Recordkeeping Requirements</p>	<p>The permittee shall keep records of:</p>	<p>This information has been provided by the material supplier. Facility maintains MSDS's for the material used in this</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
\$127.441] (Operating permit terms and conditions.)		(a) Monthly solvent usage;  (b) VOC emissions on a monthly and 12-month rolling sum basis.	equipment which demonstrates the adherence to the vapor pressure and VOC content requirements. Facility has replaced solvent based unit with aqueous based unit.	
105 - MAINTENANCE PARTS WASHER [25 Pa. Code §129.63] (Degreasing operations)	Section D - IV. Recordkeeping Requirements	The permittee shall maintain records of:  (a) an invoice, (b) a bill of sale, (c) a certificate that corresponds to a number of sales, (d) a Material Safety Data Sheet (MSDS), or (e) other appropriate documentation acceptable to the Department may be used to comply with 25 Pa. Code 129.63.	Facility operates this equipment in accordance with these requirements through equipment labeling and operating procedures. Facility has replaced solvent based unit with aqueous based unit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
105 - MAINTENANCE PARTS WASHER [25 Pa. Code §129.63] (Degreasing operations)	Section D - VI. Work Practice Standards	A person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:  (i) The name and address of the solvent supplier.  (ii) The type of solvent including the product or vendor identi...	This information has been provided by the solvent supplier. Facility maintains MSDS's for the material used in this equipment which demonstrates the adherence to the vapor pressure and VOC content requirements. Facility has replaced solvent based	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
105 - MAINTENANCE PARTS WASHER [25 Pa. Code §129.63] (Degreasing operations)	Section D - VI. Work Practice Standards	(1) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.  (2) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall:  (i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (3). In addit...	Facility operates this equipment in accordance with these requirements through equipment labeling and operating procedures. Facility has replaced solvent based unit with aqueous based unit.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermitent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-1] (Standards: Process emissions.)	Section D - I. Restrictions - Control Device Efficiency Restriction(s)	(a) As per 40 C.F.R. §60.562-1(a) and (d), vent stream emissions from this source shall be directed to Sunoco Flare (Source ID C100) that shall be operated in compliance with the requirements specified in 40 C.F.R. §60.18 at all times, as per 40 C.F.R. §60.562-1(a)(1)(i)(C) and 60.482-10(d).  (b) A...	Source emissions were directed to this control device during this period as evidenced by facility instrumentation. Braskem has confirmed that the SXL flare was operating in accordance with these requirements during this reporting period.  Although Braskem does not own or operate the flare associated with these sources, a separate Braskem program did not exist to car seal valves in either the open or closed position, for the entire review period, to document that no potential	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermitent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4	Section D - II. Testing Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(d).]	There were no performance tests required under 40 CFR 60.8 during this compliance review period; thus this requirement is not amenable to certification during this compliance review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interim
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.485]  (Test methods and procedures.)		(a) In conducting the performance tests required in §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 C.F.R. part 60 or other methods and procedures as specified in 40...	The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are used as described in this requirement.	The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the background level. All potential leak interfaces



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>are traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance.</p> <p>Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components.</p> <p>For equipment that is added, engineering judgment is used to confirm the VOC content. When this determination concludes that the piece of equipment is in VOC service, it is added to the facility's LDAR program.</p>	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]  a. The permittee shall monitor and record the polypropylene production on a monthly basis.  b. The permittee shall calculate the VOC emissions on a monthly basis and 12-month rolling sum, using Department a...	There were no samples collected during the current compliance period and thus, imposes no obligations during the current compliance review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-2] (Standards: Pumps in light liquid	Section D - III. Monitoring Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 C.F.R. §60.485(b), except as provided in 40 C.F.R. §60.482-1(c) and (f) and paragraphs (d), (e), and (f) o...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program  Facility is not claiming an exemption under this condition (d), thus this is not amenable to certification during this compliance review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4	Section D - III. Monitoring Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-7]		(a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 C.F.R. §60.485(b) and shall comply with paragraphs (b) through (e) of 40 C.F.R. §60.482-7, except as provided in paragraphs (f)....	All leaks were repaired within 15 calendar days or placed on delay of repair.	
(Standards: Valves in gas/vapor service in light liquid service.)			(e) Statement of law that imposes no compliance obligations and is thus not amenable to certification.	
			Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components.	
106 - PROPYLENE SPLITTER PROCESS &	Section D - IV. Recordkeeping Requirements	[Additional authority for this permit condition is also derived from	Polypropylene production is monitored monthly. 12-month rolling	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
CAVERN 4  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)		25 Pa. Code § 127.511]  The permittee shall keep records of  a. The polypropylene production on a monthly basis  b. The VOC emissions on a monthly basis and 12-month rolling sum.	summation of VOC emissions are kept on file.	
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.486]  (Recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(e).]  (a)(1) The permittee shall comply with the recordkeeping requirements of 40 C.F.R. §60.486.  (2) The permittee may comply with the recordkeeping requirements for the sources in one recordkeeping system if the system iden....	This condition imposes no additional requirements than those conditions elsewhere in this Section.  Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program  Facility has work practices and procedures in place, including marked-up P&IDs showing equipment in VOC service, as well as equipment not in VOC service.  Statement of law that impose no compliance obligations and are thus	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermitent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565]  (Reporting and recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	As per 40 C.F.R. §60.565(b)(2), the permittee shall keep the following records for vent system containing valves that could divert the emission stream away from the flare:  (i) All periods when flow is indicated if flow indicators are installed under 40 C.F.R. §60.563(d)(1).  (ii) All times when mai...	not amenable to certification during this compliance review period	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.487]  (Reporting requirements.)	Section D - V. Reporting Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(e).]  (a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 C.F.R. §60.486:  (1) Process unit identification.	Facility submitted semiannual reports as required by this condition  This is a historical requirement and imposes no specific requirements during the current period.  There were no performance tests conducted during the compliance review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4	Section D - V. Reporting Requirements	(2) For each month during the semiannual reporting period...		
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565]		The permittee shall submit to DEP semiannual reports of all periods recorded under 40 C.F.R. §60.565(b) when the vent stream has been diverted from the flare.	Braskem has submitted the applicable information in the semi-annual reports. No vent streams were diverted from the flare in this reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
(Reporting and recordkeeping requirements.)				
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-1]		(a) The permittee shall demonstrate compliance with the requirements of 40 C.F.R. §§60.482-1 through 60.482-10 or §60.480(e) for all equipment.	(c) Statement of law that imposes no compliance obligations and is thus not amenable to certification. Additionally, the facility has chosen not to apply for a determination of equivalency during the current compliance period.	
(Standards: General.)		(b) Compliance with 40 C.F.R. §§60.482-1 to 60.482-10 will be determined b...		
106 - PROPYLENE SPLITTER	Section D - VI. Work Practice Standards		Except as reported and submitted in Sunoco's	<input checked="" type="checkbox"/> Continuous



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
PROCESS & CAVERN 4  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-10]  (Standards: Closed vent systems and control devices.)		[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Closed vent systems and control devices must comply with the respective provisions specified in 40 C.F.R. § 60.482-10.  (b) As per 40 C.F.R. §60.482-10(f), except as provided in paragraphs (i) through (k) of this sec...	compliance certification or previous semi-annual deviation reports, the Sunoco flare is operated and maintained in compliance with 40 CFR 60.18. The closed vent system is part of the facility LDAR Program. Inspections under the facility's mechanical integrity program were conducted during this compliance review period. The closed vent system is in continuous operations when emissions may be vented through it.	<input type="checkbox"/> Interimittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-3]  (Compressors.)	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 C.F.R. §60.482-1(c) and paragraphs (h), (i), and ...	Except for compressors which are controlled by 40 CFR § 60.482-10; and compressors that have no detectable emissions and are subject to 40 CFR 60.482-3(i), all remaining compressors are either equipped with a barrier fluid system that prevents leakage of VOC to the atmosphere or are vented to a control device.  (f) Statement of law that impose no compliance obligations and are thus	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-4]  (Standards: Pressure relief devices in gas/vapor service.)	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determ...	not amenable to certification  Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  The facility did not exempt any compressors based on this condition during the compliance review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]	Sampling connection systems are equipped with a closed purge system.  The closed purge system	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-5]  (Standards: Sampling connection systems.)		(a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 C.F.R. §60.482-1(c) and paragraph (c) of 40 C.F.R. §60.482-5.  (b) Each closed-purge...	is designed to capture and transport the purged fluid to a control device.  The facility did not exempt any sampling systems based on this condition during the compliance review period.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-6]  (Standards: Open-ended valves or lines.)	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a)(1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 C.F.R. §60.482-1(c) and paragraphs (d) and (e) of 40 C.F.R. §60.482-6.  (2) The cap, blind...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  One missing cap was identified from open-ended line. This missing cap was immediately replaced upon discovery of open-ended line.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and ...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  All leaks were repaired within 15 calendar days or	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
60.482-8]  (Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors.)			placed on delay of repair.	
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - VII. Additional Requirements	The source consists the following equipment and associated vent emissions:  Two (2) splitters and associated pre-treatment and post-treatment equipment  Cavern #4  Three (3) propylene dryers (V-54A, V54-B, and V-54C)	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-9]  (Standards: Delay of	Section D - VII. Additional Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end ...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  (b) Statement of law that impose no compliance obligations and are thus not amenable to certification  Facility has not chosen to	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
106 - PROPYLENE SPLITTER PROCESS & CAVERN 4 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-2] (Standards: Equipment leaks of VOC.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  (a) As per 40 C.F.R. §60.562-2(a), the permittee shall comply with the requirements specified in 40 C.F.R. §§60.482-1 through 60.482-10.  (b) As per 40 C.F.R. §60.562-2(d), the permittee shall comply with...	This is a historical requirement and imposes no specific requirements during the current period. LDAR program was instituted at startup.  Facility has chosen not to elect this option during the current compliance period.  Facility has chosen not to apply for a determination of equivalency during the current compliance period.  The facility adheres to LDAR work practice for recordkeeping and reporting consistent with 40 CFR 60.486 and 60.487.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
107 - PROPYLENE UNLOADING RACK [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - I. Restrictions - Control Device Efficiency Restriction(s)	When the loading of rail cars with propylene occurs at this source, the air emissions shall be routed to a flare that meets the requirements of 40 CFR §60.18.	Source emissions were directed to this control device during this period as evidenced by facility instrumentation.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
107 - PROPYLENE UNLOADING RACK  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-1]  (Standards: Process emissions.)	Section D - I. Restrictions - Control Device Efficiency Restriction(s)	(a) As per 40 C.F.R. §60.562-1(a) and (d), vent stream emissions from this source shall be directed to Sunoco Flare (Source ID C100) that shall be operated in compliance with the requirements specified in 40 C.F.R. §60.18 at all times, as per 40 C.F.R. §60.562-1(a)(1)(i)(C) and 60.482-10(d).  (b) A...	Source emissions were directed to this control device during this period as evidenced by facility instrumentation. Braskem has confirmed that the SXL flare was operating in accordance with these requirements during this reporting period.  Although Braskem does not own or operate the flare associated with these sources, a separate Braskem program did not exist to car seal valves in either the open or closed position, for the entire reporting period, to document that no potential flare bypasses occurred.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent
107 - PROPYLENE UNLOADING RACK  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.485]  (Test methods and procedures.)	Section D - II. Testing Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(d).]  (a) In conducting the performance tests required in §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of 40 C.F.R. part 60 or other methods and procedures as specified in 40...	There were no performance tests required under 40 CFR 60.8 during this compliance review period; thus this requirement is not amenable to certification during this compliance review period.  The facility uses a contractor to comply with the standards set forth in	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>this requirement. The contractor follows Method 21 to determine the presence of leaking sources. The contractor has work practices in place to ensure proper calibration gases are use as described in this requirement.</p> <p>The facility uses a contractor to comply with the standards set forth in this requirement. The contractor follows Method 21 to determine the background level. All potential leak interfaces are traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicates by the instrument and the background level is compared with 500 ppm for determining compliance.</p> <p>Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in</p>	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			<p>the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components.</p> <p>For equipment that is added, engineering judgment is used to confirm the VOC content. When this determination concludes that the piece of equipment is in VOC service, it is added to the facility's LDAR program.</p> <p>There were no samples collected during the current compliance period and thus, imposes no obligations during the current compliance review period.</p>	
<p>107 - PROPYLENE UNLOADING RACK</p> <p>[25 Pa. Code §127.441]</p> <p>(Operating permit terms and conditions.)</p>	<p>Section D - III. Monitoring Requirements</p>	<p>The permittee shall monitor and record the amount of materials loaded and unloaded in barrels of each loading.</p>	<p>The amount of materials loaded and unloaded are tracked in a facility tracking spreadsheet.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
107 - PROPYLENE UNLOADING RACK  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-2]  (Standards: Pumps in light liquid service.)	Section D - III. Monitoring Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a)(1) Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 C.F.R. §60.485(b), except as provided in 40 C.F.R. §60.482-1(c) and (f) and paragraphs (d), (e), and (f) o...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimittent
107 - PROPYLENE UNLOADING RACK  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-7]  (Standards: Valves in gas/vapor service in light liquid service.)	Section D - III. Monitoring Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a)(1) Each valve shall be monitored monthly to detect leaks by the methods specified in 40 C.F.R. §60.485(b) and shall comply with paragraphs (b) through (e) of 40 C.F.R. §60.482-7, except as provided in paragraphs (f)....	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  Through periodic review and evaluation any components that are discovered which require to be added to the LDAR program are included in the LDAR database and monitored. Braskem has a MOC process and a periodic review of scheduled maintenance activities to track any changes to LDAR components.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
107 - PROPYLENE UNLOADING RACK [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	The permittee shall keep the following records:  a. Number of loadings and unloadings on a monthly basis b. Amount of loaded and unloaded propane/propylene mixture on a monthly basis c. The emissions from the loading and unloading operations on a monthly basis and 12-month rolling sum.	All leaks were repaired within 15 calendar days or placed on delay of repair.  (e) Statement of law that impose no compliance obligations and are thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimittent
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.486]  (Recordkeeping requirements.)	Section D - IV. Recordkeeping Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(e).]  (a)(1) The permittee shall comply with the recordkeeping requirements of 40 C.F.R. §60.486.  (2) The permittee may comply with the recordkeeping requirements for the sources in one recordkeeping system if the	This condition imposes no additional requirements than those conditions elsewhere in this Section.  Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program  Facility has work practices and procedures in place,	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
		system iden...	including marked-up P&IDs showing equipment in VOC service, as well as equipment not in VOC service. (h) Statement of law that impose no compliance obligations and are thus not amenable to certification during this compliance review period.	
107 - PROPYLENE UNLOADING RACK	Section D - IV. Recordkeeping Requirements	As per 40 C.F.R. §60.565(b)(2), the permittee shall keep the following records for vent system containing valves that could divert the emission stream away from the flare:	Although Braskem does not own or operate the flare associated with these sources, a separate Braskem program did not exist to car seal valves in either the open or closed position, for the entire reporting period, to document that no potential flare bypasses occurred.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermitent
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565]  (Reporting and recordkeeping requirements.)		(i) All periods when flow is indicated if flow indicators are installed under 40 C.F.R. §60.563(d)(1).  (ii) All times when mai...		
107 - PROPYLENE UNLOADING RACK	Section D - V. Reporting Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(e).]	Facility submitted semiannual reports as required by this condition	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermitent
[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.487]		(a) All semiannual reports to DEP shall include the following information, summarized from the information in 40 C.F.R.	This is a historical requirement and imposes no specific requirements during the current period.  There were no	

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Reporting requirements.)		\$60.486:  (1) Process unit identification.  (2) For each month during the semiannual reporting perio...	performance tests conducted during the compliance review period.	
107 - PROPYLENE UNLOADING RACK  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.565]  (Reporting and recordkeeping requirements.)	Section D - V. Reporting Requirements	The permittee shall submit to DEP semiannual reports of all periods recorded under 40 C.F.R. §60.565(b) when the vent stream has been diverted from the flare.	Braskem has submitted the applicable information in the semi-annual reports. No vent streams were diverted from the flare in this reporting period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
107 - PROPYLENE UNLOADING RACK  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-1]  (Standards: General.)	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) The permittee shall demonstrate compliance with the requirements of 40 C.F.R. §§60.482-1 through 60.482-10 or §60.480(e) for all equipment.  (b) Compliance with 40 C.F.R. §§60.482-1 to 60.482-10 will be determined b...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  (c) Statement of law that imposes no compliance obligations and is thus not amenable to certification. Additionally, the facility has chosen not to apply	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
<p>107 - PROPYLENE UNLOADING RACK</p> <p>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-10]</p> <p>(Standards: Closed vent systems and control devices.)</p>	<p>Section D - VI. Work Practice Standards</p>	<p>[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]</p> <p>(a) Closed vent systems and control devices must comply with the respective provisions specified in 40 C.F.R. § 60.482-10.</p> <p>(b) As per 40 C.F.R. §60.482-10(f), except as provided in paragraphs (i) through (k) of this sec...</p>	<p>for a determination of equivalency during the current compliance period.</p> <p>Except as reported and submitted in Sunoco's compliance certification or previous semi-annual deviation reports, the Sunoco flare is operated and maintained in compliance with 40 CFR 60.18. The closed vent system is part of the facility LDAR Program. Inspections under the facility's mechanical integrity program were conducted during this compliance review period. The closed vent system is in continuous operations when emissions may be vented through it.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>
<p>107 - PROPYLENE UNLOADING RACK</p> <p>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-3]</p>	<p>Section D - VI. Work Practice Standards</p>	<p>[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]</p> <p>(a) Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 C.F.R. §60.482-1(c) and paragraphs (h), (i), and ...</p>	<p>Except for compressors which are controlled by 40 CFR § 60.482-10, and compressors that have no detectable emissions and are subject to 40 CFR 60.482-3(i), all remaining compressors are either equipped with a barrier fluid system that prevents leakage of VOC to the</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermittent</p>

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
(Compressors.)			<p>atmosphere or are vented to a control device.</p> <p>(f) Statement of law that impose no compliance obligations and are thus not amenable to certification</p> <p>Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.</p> <p>The facility did not exempt any compressors based on this condition during the compliance review period.</p>	
<p>107 - PROPYLENE UNLOADING RACK</p> <p>[40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-4]</p> <p>(Standards: Pressure relief devices in gas/vapor service.)</p>	Section D - VI. Work Practice Standards	<p>[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]</p> <p>(a) Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determ...</p>	<p>Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.</p> <p>All leaks were repaired within 5 calendar days or placed on delay of repair.</p>	<p><input checked="" type="checkbox"/> Continuous</p> <p><input type="checkbox"/> Intermitent</p>



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
107 - PROPYLENE UNLOADING RACK  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-5]  (Standards: Sampling connection systems.)	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 C.F.R. §60.482-1(c) and paragraph (c) of 40 C.F.R. §60.482-5.  (b) Each closed-purge...	Sampling connection systems are equipped with a closed purge system.  The closed purge system is designed to capture and transport the purged fluid to a control device.  The facility did not exempt any sampling systems based on this condition during the compliance review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
107 - PROPYLENE UNLOADING RACK  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-6]  (Standards: Open- ended valves or lines.)	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a)(1) Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 C.F.R. §60.482-1(c) and paragraphs (d) and (e) of 40 C.F.R. §60.482-6.  (2) The cap, blin...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  Miscellaneous caps missing from open-ended lines. Each missing cap was immediately replaced upon discovery of open- ended line.	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent
107 - PROPYLENE UNLOADING RACK  [40 CFR Part 60 Standards of Performance for	Section D - VI. Work Practice Standards	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
New Stationary Sources §40 CFR 60.482-8]  (Standards: Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and heavy liquid connectors.)		heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and ...	Program.  All leaks were repaired within 15 calendar days or placed on delay of repair.	
107 - PROPYLENE UNLOADING RACK  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - VII. Additional Requirements	This source consists of a loading rack, storages, and transfer lines for purchased polymer grade propylene and purchased refinery grade propylene.	Statement of law that imposes no compliance obligations and is thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
107 - PROPYLENE UNLOADING RACK  [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.482-9]  (Standards: Delay of repair.)	Section D - VII. Additional Requirements	[Authority for this permit condition is derived from 40 C.F.R. §60.562-2(a).]  (a) Delay of repair of equipment for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end ...	Facility has work practices and procedures in place, including VOC monitoring reports maintained as part of the facility LDAR Program.  (b) Statement of law that impose no compliance obligations and are thus not amenable to certification  Facility has not chosen to	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
107 - PROPYLENE UNLOADING RACK [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.562-2]  (Standards: Equipment leaks of VOC.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  (a) As per 40 C.F.R. §60.562-2(a), the permittee shall comply with the requirements specified in 40 C.F.R. §§60.482-1 through 60.482-10.  (b) As per 40 C.F.R. §60.562-2(d), the permittee shall comply with...	This is a historical requirement and imposes no specific requirements during the current period. LDAR program was instituted at startup.  Facility has chosen not to elect this option during the current compliance period.  Facility has chosen not to apply for a determination of equivalency during the current compliance period.  The facility adheres to LDAR work practice for recordkeeping and reporting consistent with 40 CFR 60.486 and 60.487.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimittent
108 - FIRE WATER PUMP ENGINES [25 Pa. Code §123.21] (General)	Section D - I. Restrictions - Emission Restriction(s)	No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO <sub>2</sub> , in the effluent gas exceeds 500 parts per million, by volume, dry basis.	Statement of law not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimittent
108 - FIRE WATER	Section D - I. Restrictions -	Each emergency engine shall be operated less than 500 hours	Facility tracks fire water engine operating time on a	<input checked="" type="checkbox"/> Continuous

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
PUMP ENGINES [25 Pa. Code §129.93] (Presumptive RACT emission limitations)	Operating Hours Restriction(s)	in a consecutive 12-month period.	continuous basis	<input type="checkbox"/> Interimittent
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for Source Categories \$40 CFR 63.6640] (How do I demonstrate continuous compliance with the emission limitations and operating limitations?)	Section D - I. Restrictions - Operating Hours Restriction(s)	The permittee must operate the emergency stationary RICE according to the requirements specified below as per paragraph(f) of 40 C.F.R. §63.6640. In order for the engine to be considered an emergency stationary RICE, any operation other than emergency operation, maintenance and testing, emergency de...	The facility tracks operating hours of each engine to confirm the uses are within guidelines.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimittent
108 - FIRE WATER PUMP ENGINES [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - III. Monitoring Requirements	The permittee shall monitor and record the operating hours each time the engines are operated.	The facility tracks operating hours of each engine to confirm the uses are within guidelines.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimittent
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63	Section D - III. Monitoring Requirements	The permittee must install a non-resettable hour meter.	Facility performs routine checks on engines and records operating hours.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Interimittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
NESHAPS for Source Categories §40 CFR 63.6625]  (What are my monitoring, installation, operation, and maintenance requirements?)				
108 - FIRE WATER PUMP ENGINES [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	The permittee shall keep the following records each time the engines are operated:  (a) The date (b) The reason(s) the engine was operated (c) Hours operated	The facility tracks operating hours of each engine to confirm the uses are within guidelines.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermitent
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6655]  (What records must I keep?)	Section D - IV. Recordkeeping Requirements	The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the stationary RICE was operated and maintained according to owner's maintenance plan.	The facility documents any maintenance performed to ensure the engines are following manufacturer's recommendations.  The facility did not perform the manufacturer's recommended weekly preventative maintenance for one isolated week in this reporting period.  Facility was in a significant maintenance outage	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermitent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
108 - FIRE WATER PUMP ENGINES [40 CFR Part 63 NESHAPS for Source Categories \$40 CFR 63.6660] (In what form and how long must I keep my records?)	Section D - IV. Recordkeeping Requirements	(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).  (b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.  (c) You...	during this event. Additional training and communications were implemented to ensure all required preventative maintenance tasks are completed regardless of the operation of the production facility.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
108 - FIRE WATER PUMP ENGINES [25 Pa. Code §129.93] (Presumptive RACT emission limitations)	Section D - VI. Work Practice Standards	The permittee shall maintain and operate the source in accordance with manufacturers specifications.	The facility maintains manufacturer specifications. Routine preventative maintenance is scheduled through the facility's maintenance tracking system.  The facility did not perform the manufacturer's recommended weekly preventative maintenance for one isolated week in	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
			this reporting period. Facility was in a significant maintenance outage during this event. Additional training and communications were implemented to ensure all required preventative maintenance tasks are completed regardless of the operation of the production facility.	
108 - FIRE WATER PUMP ENGINES  [40 CFR Part 63 NESHAPS for Source Categories \$40 CFR 63.6603]  (What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?)	Section D - VI. Work Practice Standards	The permittee must comply with the following requirements as specified in Item 4 of Table 2d to 40 C.F.R. 63 Subpart ZZZZ:  a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes fir...	Routine preventative maintenance is scheduled through the facility's maintenance tracking system.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
108 - FIRE WATER PUMP ENGINES  [40 CFR Part 63 NESHAPS for	Section D - VI. Work Practice Standards	(a) The permittee must be in compliance with the requirements in this subpart that apply to you at all times.	The facility uses established tracking spreadsheets to document operating hours and a	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
Source Categories \$40 CFR 63.6605]  (What are my general requirements for complying with this subpart?)		(b) At all times the permittee must operate and maintain the engines in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of w...	maintenance scheduling system to confirm that preventative maintenance is performed.	
108 - FIRE WATER PUMP ENGINES  [40 CFR Part 63 NESHAPS for Source Categories \$40 CFR 63.6625]  (What are my monitoring, installation, operation, and maintenance requirements?)	Section D - VI. Work Practice Standards	(a) The permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air poll...	The facility uses established tracking spreadsheets to document operating hours and a maintenance scheduling system to confirm that preventative maintenance is performed.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
108 - FIRE WATER PUMP ENGINES  [40 CFR Part 63 NESHAPS for Source Categories \$40 CFR 63.6640]  (How do I demonstrate continuous compliance with the emission limitations	Section D - VI. Work Practice Standards	The permittee must demonstrate continuous compliance with the requirements in Item 4 of Table 2d to 40 C.F.R. 63 Subpart ZZZZ according to the following methods as specified in item 9 of Table 6 to 40 C.F.R. 63 Subpart ZZZZ.  (a) Operating and maintaining the stationary RICE according to the manufa...	The facility uses established tracking spreadsheets to document operating hours and a maintenance scheduling system to confirm that preventative maintenance is performed.  The facility did not perform the manufacturer's recommended weekly preventative maintenance	<input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
and operating limitations?)			for one isolated week in this reporting period.  Facility was in a significant maintenance outage during this event. Additional training and communications were implemented to ensure all required preventative maintenance tasks are completed regardless of the operation of the production facility.	<input checked="" type="checkbox"/> Continuous
108 - FIRE WATER PUMP ENGINES  [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6595]  (When do I have to comply with this subpart?)	Section D - VII. Additional Requirements	The permittee must comply with the applicable requirements of 40 C.F.R. 63 Subpart ZZZZ no later than May 3, 2013.	The facility uses established tracking spreadsheets to document operating hours and a maintenance scheduling system to confirm that preventative maintenance is performed.	<input type="checkbox"/> Intermittent
C02 - FLARE SYSTEM (STEAM-ASSISTED)  [25 Pa. Code §127.441]  (Operating permit terms and	Section D - III. Monitoring Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  The permittee shall	The facility measures flare BTU value using a flare gas analyzer. Flare exit velocity is measured using a dedicated flare flow meter.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
conditions.)		(a) monitor continuously the heat content of the flare gas using a gas chromatography (GC) analyzer or Department approved device  (b) monitor continuously the velocity of the gas ...		
C02 - FLARE SYSTEM (STEAM-ASSISTED)  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - IV. Recordkeeping Requirements	(1) The permittee shall maintain daily records of :  (a) the readings of the heat content (b) the readings of the exit velocity (c) the calculations of the net heating value and the exit velocity, on a three (3) hour rolling average  (2) At least 90% of each quarter's data shall be available at all ...	Facility records are maintained for the net heating value, exit velocity, and data availability. Reports were submitted in accordance with 40 CFR 565 during this compliance review period.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
C02 - FLARE SYSTEM (STEAM-ASSISTED)  [25 Pa. Code §127.441]  (Operating permit terms and conditions.)	Section D - V. Reporting Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  (a) The permittee shall notify the Department within two hours during normal working hours of any malfunction of the flare which is expected to last longer than two hours.  (b) The permittee shall submit ...	Facility has work practices and procedures in place in accordance with applicable regulatory requirements and as specified by individual terms and conditions of this Permit. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections" and the facility's total event	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent



Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
C02 - FLARE SYSTEM (STEAM- ASSISTED) [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - VI. Work Practice Standards	The flare shall be operated with no emissions of malodorous air contaminants detectable beyond the plant's property in conformance with 25 Pa. Code Section 123.31	To prevent the detection of malodors outside of the property, the facility has work practices in place, in accordance with applicable regulatory requirements and as specified by individual permit terms and conditions below. These practices include a process for review and correction of deviations reported via routine "odor and visible emission inspections", the facility's total event reporting process, and the hydrocarbon Leak Detection and Repair program. Compliance review for this term consisted of a review by Braskem America, Inc. staff of the reports and records associated with these work practices.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
C02 - FLARE SYSTEM (STEAM- ASSISTED) [25 Pa. Code	Section D - VI. Work Practice Standards	The permittee shall (a) operate and maintain all devices according to	Facility has system in place to maintain the flare analyzer and flow meter in accordance with good engineering practices. Calibrations of this	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

Citation	Permit Section	Terms & Conditions Contained in the Permit	Means of Determining Compliance Status	Compliance with Terms & Conditions was:
§127.441] (Operating permit terms and conditions.)		manufacturer's specifications and/or good operating practices.  (b) calibrate the GC analyzer and the gas flow meter, according to manufacturer's specifications and/or good operating practices, monthly.	equipment take place on a monthly basis.	
C02 - FLARE SYSTEM (STEAM-ASSISTED) [25 Pa. Code §127.441] (Operating permit terms and conditions.)	Section D - VII. Additional Requirements	[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]  The flare system is for the control of Volatile Organic Compound (VOC) emissions from Plant 1 and Plant 2 manufacturing sources, except the typical atmospheric venting - PSV lifts, etc.	Statement of law that impose no compliance obligations and are thus not amenable to certification.	<input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Intermittent

